

EXHIBIT C

Huntsville Court Reporting

<p style="text-align: right;">1</p> <p>1 IN THE EASTERN DISTRICT COURT FOR THE</p> <p>2 EASTERN DISTRICT OF VIRGINIA</p> <p>3 ALEXANDRIA DIVISION</p> <p>4</p> <p>5 UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY</p> <p>6 COMMISSION,</p> <p>7 Plaintiff,</p> <p>8</p> <p>9 vs. CASE NO. 17-CV-01084-AJT-JFA</p> <p>10</p> <p>11 CAMBER CORPORATION,</p> <p>12 Defendant.</p> <p>13 * * * * *</p> <p>14 IT IS STIPULATED AND AGREED, by</p> <p>15 and between the parties through their</p> <p>16 respective counsel, that the deposition</p> <p>17 of:</p> <p>18 DEBORAH WHITTEN,</p> <p>19 may be taken before Heather Spier, Court</p> <p>20 Reporter and Notary Public, State at</p> <p>21 Large, pursuant to Rule 30 of the Federal</p> <p>22 Rules of Civil Procedure, at 7027 Old</p> <p>23 Madison Pike, Suite 108, Huntsville,</p> <p>24 Alabama on the 3rd day of April 2018 at</p> <p>25 9:00 a.m.</p>	<p style="text-align: right;">3</p> <p>1 <u>APPEARANCES</u></p> <p>2</p> <p>3 FOR THE PLAINTIFF:</p> <p>4 MR. JEFFREY A. STERN</p> <p>5 Attorney at Law</p> <p>6 EEOC, Cleveland Field Office</p> <p>7 1240 East Ninth Street, Suite 3001</p> <p>8 AJC Federal Building</p> <p>9 Cleveland, Ohio 44199</p> <p>10 216-522-7458; Fax 216-522-7430</p> <p>11</p> <p>12 FOR THE DEFENDANT:</p> <p>13 MR. ROBERT L. ORTBALS, JR.</p> <p>14 Attorney at Law</p> <p>15 Constangy Brooks, Smith & Prophete</p> <p>16 7733 Forsyth Boulevard</p> <p>17 Suite 1325</p> <p>18 St. Louis, Missouri 63105</p> <p>19 314-925-7270</p> <p>20</p> <p>21 ALSO PRESENT:</p> <p>22 Mr. Peter Hardwick</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">2</p> <p>1 <u>STIPULATIONS</u></p> <p>2</p> <p>3 IT IS FURTHER STIPULATED AND AGREED that</p> <p>4 the signature to and reading of the</p> <p>5 deposition by the witness is not waived,</p> <p>6 the deposition to have the same force and</p> <p>7 effect as if full compliance had been had</p> <p>8 with all laws and rules of Court relating</p> <p>9 to the taking of depositions.</p> <p>10 IT IS FURTHER STIPULATED AND AGREED that</p> <p>11 it shall not be necessary for any</p> <p>12 objections to be made by counsel to any</p> <p>13 questions, except as to form or leading</p> <p>14 questions, and that counsel for the</p> <p>15 parties may make objections and assign</p> <p>16 grounds at the time of the trial, or at</p> <p>17 the time said deposition is offered in</p> <p>18 evidence, or prior thereto.</p> <p>19 IT IS FURTHER STIPULATED AND AGREED that</p> <p>20 notice of filing of the deposition by the</p> <p>21 Commissioner is waived.</p> <p>22 * * * * *</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">4</p> <p>1 INDEX</p> <p>2 PAGE:</p> <p>3 EXAMINATION BY MR. STERN 5</p> <p>4</p> <p>5 EXHIBITS</p> <p>6 Plaintiff's Exhibit 1 9</p> <p>7 Plaintiff's Exhibit 2 39</p> <p>8 Plaintiff's Exhibit 3 44</p> <p>9 Plaintiff's Exhibit 4 54</p> <p>10 Plaintiff's Exhibit 5 65</p> <p>11 Plaintiff's Exhibit 6 67</p> <p>12 Plaintiff's Exhibit 7 72</p> <p>13 Plaintiff's Exhibit 9 83</p> <p>14 Plaintiff's Exhibit 10 91</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">73</p> <p>1 A. Yes. Yes.</p> <p>2 Q. Who's is the sender?</p> <p>3 A. Cassee Ger was my -- another HR</p> <p>4 generalist. She took over Lisa Thompson's</p> <p>5 place when Lisa resigned.</p> <p>6 Q. Also in Fairfax?</p> <p>7 A. Yes. But she actually split her</p> <p>8 time between the Fairfax and Centerville</p> <p>9 office. They were close. But she was in</p> <p>10 the D.C. area.</p> <p>11 Q. Exhibit 7, Page 2070 is an email</p> <p>12 from her to you on May 8, 2015 on the</p> <p>13 subject of "job offer requests - Saritha</p> <p>14 Prathipati --"</p> <p>15 A. Right.</p> <p>16 Q. "-- senior .NET developer,"</p> <p>17 right?</p> <p>18 A. Right.</p> <p>19 Q. What is "TTP conversion!"</p> <p>20 A. That means temp to perm</p> <p>21 conversion.</p> <p>22 Q. What does that mean?</p> <p>23 A. Temp to perm, it means they used</p> <p>24 an agency.</p> <p>25 Q. Is that Ms. Prathipati had been a</p>	<p style="text-align: right;">75</p> <p>1 the charge we talked to Atif about who</p> <p>2 replaced him.</p> <p>3 Q. What was the gist of what Atif</p> <p>4 told you?</p> <p>5 A. At the time he told me it was a</p> <p>6 Peter Chu.</p> <p>7 Q. Any discussion with Atif or</p> <p>8 anyone else at Camber about anyone other</p> <p>9 than Mr. Chu replacing Mr. Pai?</p> <p>10 A. No.</p> <p>11 Q. What role did HR have with</p> <p>12 respect to temp employees such as Ms.</p> <p>13 Prathipati before she was converted to</p> <p>14 perm?</p> <p>15 A. I didn't have any -- I didn't</p> <p>16 have any responsibility for the temp</p> <p>17 hires. They just went straight through an</p> <p>18 agency. They didn't -- I didn't have</p> <p>19 anything to do with them until they became</p> <p>20 actual Camber employees.</p> <p>21 Q. By agency you mean some eternal</p> <p>22 job, firm, employment firm?</p> <p>23 A. Yes.</p> <p>24 Q. You're not implying that that was</p> <p>25 handled by an inhouse Camber recruiter?</p>
<p style="text-align: right;">74</p> <p>1 temp and was being converted to permanent?</p> <p>2 A. Yes.</p> <p>3 Q. As a senior .Net developer,</p> <p>4 right?</p> <p>5 A. Well, the email says senior .Net</p> <p>6 developer. The requisition just says .Net</p> <p>7 developer.</p> <p>8 Q. And the requisition starting at</p> <p>9 Page 2971 states that the requisition</p> <p>10 information section -- and it's right</p> <p>11 about the middle of the document, reason</p> <p>12 for the opening was a resignation?</p> <p>13 A. Yes.</p> <p>14 Q. And the name of the person being</p> <p>15 replaced is Ashok Pai, right?</p> <p>16 A. Yes.</p> <p>17 Q. Did Saritha Prathipati replace</p> <p>18 Mr. Pai?</p> <p>19 A. She or he, I'm not even sure,</p> <p>20 took the position that that changed into,</p> <p>21 apparently.</p> <p>22 Q. Have you had any discussion with</p> <p>23 anyone at Camber regarding who replaced</p> <p>24 Mr. Pai?</p> <p>25 A. When I was first responding to</p>	<p style="text-align: right;">76</p> <p>1 A. Right.</p> <p>2 Q. The next document is PAI002310</p> <p>3 through 2326 is Exhibit 8 to your</p> <p>4 deposition.</p> <p>5 A. Okay.</p> <p>6 Q. Is Exhibit 8 to your deposition</p> <p>7 one of the documents you reviewed</p> <p>8 recently?</p> <p>9 A. No, we didn't go over this. I</p> <p>10 might have went over a couple of pages on</p> <p>11 this, but it doesn't -- I don't -- I don't</p> <p>12 think so. (Examining document.)</p> <p>13 Q. Let me know when you're ready.</p> <p>14 A. I'm ready.</p> <p>15 Q. Exhibit 8 to your deposition is</p> <p>16 an email printed by you from Deidra Martin</p> <p>17 September 17, 2015?</p> <p>18 A. Right.</p> <p>19 Q. Forwarding to you email string</p> <p>20 "absence from work due to family member's</p> <p>21 illness" and some images of FMLA</p> <p>22 paperwork, Dr. Kleinman, right?</p> <p>23 A. Right.</p> <p>24 Q. Now, the first email in this</p> <p>25 string, and by first I mean earliest, is</p>

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<p style="text-align: right;">97</p> <p>1 Q. Did you receive any that were</p> <p>2 provided to you by Mr. Khalil?</p> <p>3 A. I don't know. I don't think -- I</p> <p>4 don't remember.</p> <p>5 Q. When you went into the system to</p> <p>6 find the requisitions to print during the</p> <p>7 EEOC investigation --</p> <p>8 A. Right.</p> <p>9 Q. -- how did you know which ones to</p> <p>10 print? That is, how did you find them?</p> <p>11 A. I would have had --</p> <p>12 Q. Tell me a little bit of how you</p> <p>13 found them.</p> <p>14 A. I would have had to know the name</p> <p>15 of the person, and then I would have had</p> <p>16 to find the associated requisition to go</p> <p>17 with it.</p> <p>18 Q. And how did you acquire the names</p> <p>19 of the person to find their associated</p> <p>20 requisitions?</p> <p>21 A. Since I'm not sure exactly which</p> <p>22 requisitions you're talking to, it would</p> <p>23 have been from a hiring list or a note</p> <p>24 Atif gave me Peter Chung's name.</p> <p>25 Q. Did Atif provide you with the</p>	<p style="text-align: right;">99</p> <p>1 And if you have forgotten all those</p> <p>2 different things, we can break them down</p> <p>3 one at a time.</p> <p>4 MR. ORTBALS: I'm going to object</p> <p>5 to that entire form of the question as</p> <p>6 being compound, argumentative,</p> <p>7 mischaracterizing the evidence. But we'll</p> <p>8 go through it.</p> <p>9 Q. Okay. Well, this time we'll</p> <p>10 break it down. Any discussions or other</p> <p>11 communications with the following about</p> <p>12 Mr. Pai: Christopher Towne?</p> <p>13 A. What was that name again?</p> <p>14 Q. First name Christopher, surname</p> <p>15 Towne?</p> <p>16 A. I don't even remember who that</p> <p>17 is.</p> <p>18 Q. Anyone at EOIR, such as Howard</p> <p>19 Myatt, David Fruewald or Debra Whitaker?</p> <p>20 A. I would have had no discussion</p> <p>21 with the customer, no.</p> <p>22 Q. Nan Li?</p> <p>23 A. I don't recall.</p> <p>24 Q. Supervisors of Mr. Pai?</p> <p>25 A. Atif.</p>
<p style="text-align: right;">98</p> <p>1 name of Saritha Prathipati?</p> <p>2 A. I don't remember that at the</p> <p>3 time. I mean, at the time he just said</p> <p>4 Peter Chung.</p> <p>5 Q. Who was Nedi Panchasara.</p> <p>6 A. Nedi was another -- I think she</p> <p>7 was a division manager at the time.</p> <p>8 Q. Camber has indicated that you</p> <p>9 maybe able to testify about interactions</p> <p>10 you've had with various individuals.</p> <p>11 So I'm going to go through a list of</p> <p>12 individuals and find out what interacting</p> <p>13 you've had.</p> <p>14 So I'll ask it this way, any</p> <p>15 discussions or any communication with any</p> <p>16 of these persons about Mr. Pai, about his</p> <p>17 transfer request, about Camber's treating</p> <p>18 his request as a resignation, the FMLA</p> <p>19 leave to care for his son, his termination</p> <p>20 of his replacement.</p> <p>21 Now, we can break them down. And</p> <p>22 I don't need you to discuss what you have</p> <p>23 already told me.</p> <p>24 A. Okay.</p> <p>25 Q. But let me go through the list.</p>	<p style="text-align: right;">100</p> <p>1 Q. Anyone else as a supervisor of</p> <p>2 Mr. Pai?</p> <p>3 A. I don't remember speaking to</p> <p>4 anybody else.</p> <p>5 Q. Sudhakar Nallamotheu?</p> <p>6 A. I don't remember speaking</p> <p>7 directly to him.</p> <p>8 Q. How about indirectly?</p> <p>9 A. It would have been what Atif told</p> <p>10 me.</p> <p>11 Q. What did Atif tell you about</p> <p>12 Sudhakar Nallamotheu and Mr. Pai?</p> <p>13 A. Just what I've already told you</p> <p>14 about. I don't remember anything else.</p> <p>15 Q. Emishaw Dejene Daddi?</p> <p>16 A. No.</p> <p>17 Q. Emita Choudhry?</p> <p>18 A. No.</p> <p>19 Q. Joe Barbaretta?</p> <p>20 A. No.</p> <p>21 Q. Mike Williams?</p> <p>22 A. Yes, I did have some discussions</p> <p>23 with him.</p> <p>24 Q. What discussions with Mike</p> <p>25 Williams about Mr. Pai?</p>

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<p style="text-align: right;">105</p> <p>1 MR. ORTBALS: Objection. It's</p> <p>2 argumentative and speculative, but you can</p> <p>3 answer.</p> <p>4 A. I don't think so.</p> <p>5 Q. Ever discuss that with anyone at</p> <p>6 Camber?</p> <p>7 A. No.</p> <p>8 MR. ORTBALS: Same objection to</p> <p>9 form.</p> <p>10 Q. Do you have any relatives</p> <p>11 employed at Camber?</p> <p>12 A. No.</p> <p>13 Q. What's the name of the larger</p> <p>14 company that purchased Camber?</p> <p>15 A. Huntington Industry.</p> <p>16 Q. Any relatives employed by</p> <p>17 Huntington?</p> <p>18 A. No.</p> <p>19 Q. During your gathering of</p> <p>20 information in response to the charge by</p> <p>21 Mr. Pai that you had mentioned, did you</p> <p>22 come to understand whether there were any</p> <p>23 funded indirect or contingent positions</p> <p>24 available in California or the western</p> <p>25 states in September or October 2014?</p>	<p style="text-align: right;">107</p> <p>1 documents that we've looked at in your</p> <p>2 deposition today, did you come to find any</p> <p>3 other documents?</p> <p>4 To ask the question over, are</p> <p>5 there other Prathipati documents that</p> <p>6 weren't included in the package of</p> <p>7 exhibits that you've looked at today?</p> <p>8 A. I mean, I'm sure there's an offer</p> <p>9 letter, but nothing about the requisition</p> <p>10 or position.</p> <p>11 Q. Any documents explaining why Ms.</p> <p>12 Prathipati was working as a temp until she</p> <p>13 became permanent?</p> <p>14 A. No.</p> <p>15 Q. And you did not find any</p> <p>16 requisitions regarding Ms. Prathipati when</p> <p>17 you were looking using names provided by</p> <p>18 Mr. Khalil?</p> <p>19 A. Apparently not.</p> <p>20 Q. Fair to say if that name had been</p> <p>21 provided to you by Mr. Khalil during the</p> <p>22 investigation, you would have looked for</p> <p>23 those documents --</p> <p>24 A. Yes.</p> <p>25 Q. -- in your search?</p>
<p style="text-align: right;">106</p> <p>1 MR. ORTBALS: Object to the form.</p> <p>2 Requires the witness to testify to</p> <p>3 documents that aren't in evidence. But if</p> <p>4 you know the answer, you can answer.</p> <p>5 A. I don't know about the time</p> <p>6 frame. I think we hired a few</p> <p>7 individuals, but they weren't anywhere</p> <p>8 along the same skill set as Mr. Pai.</p> <p>9 Q. Did there come a time when there</p> <p>10 were contingent positions in connection</p> <p>11 with Sylar Security in or about Southern</p> <p>12 California, San Diego?</p> <p>13 A. I don't recall that.</p> <p>14 Q. Did you come to understand that</p> <p>15 Ms. Prathipati was working as a temp from</p> <p>16 late 2014 through her hire at Camber May</p> <p>17 2015 while her security was being</p> <p>18 investigated?</p> <p>19 A. I'm not even sure about the last</p> <p>20 part, but that just came to my attention</p> <p>21 last week.</p> <p>22 Q. Any time before last week when it</p> <p>23 came to your attention?</p> <p>24 A. No.</p> <p>25 Q. Other than the Prathipati</p>	<p style="text-align: right;">108</p> <p>1 A. Yes.</p> <p>2 Q. Yes? Did Mr. Jain supply any</p> <p>3 documents to you during the EEOC</p> <p>4 investigation?</p> <p>5 A. I don't remember him giving me</p> <p>6 anything.</p> <p>7 Q. He didn't provide you any names</p> <p>8 to search for in the requisition database?</p> <p>9 A. I wouldn't -- would not think Mr.</p> <p>10 Jain would do that, no. He's not that</p> <p>11 level.</p> <p>12 Q. His subordinate Mr. Khalil would</p> <p>13 have done that, right?</p> <p>14 A. Right.</p> <p>15 MR. STERN: Bob, do you have any</p> <p>16 questions?</p> <p>17 MR. ORTBALS: No, I don't have</p> <p>18 any questions.</p> <p>19 Q. I have no further questions. The</p> <p>20 reporter will type up the transcript which</p> <p>21 will be made available for your review and</p> <p>22 signature. You don't have to sign, but if</p> <p>23 you do, it will be made available.</p> <p>24 A. Okay.</p> <p>25 Q. Would you prefer to have it sent</p>